

**IN THE STATE COURT OF DEKALB COUNTY
STATE OF GEORGIA**

BILLY HILL

Plaintiff,

VS.

**RARE HOSPITALITY
MANAGEMENT, LLC DBA
LONGHORN STEAKHOUSE,
DAVID WILLIAMS** in his/her/their
professional capacity, and **JOHN
DOES NOS 1-10**, whether singular
or plural, masculine or feminine,
individuals or corporations, who are
not known at this time, but will be
added by amendment when
ascertained.

Defendant(s).

CIVIL ACTION NO.: 23A00559

**MOTION TO APPOINT SPECIAL AGENT FOR SERVICE OF
PROCESS**

COMES NOW Billy Hill, by and through undersigned counsel of record,
and files this Motion to Appoint a Special Agent for Service of Process, and
respectfully shows this Honorable Court as follows:

1.

Plaintiff filed the instant lawsuit on February 3, 2023.

Billy Hill v. RARE Hospitality Management, LLC dba Longhorn Steakhouse et. al.,

DeKalb County State Court

Motion to Appoint Special Agent for Service of Process

Exhibit 6

2.

RARE Hospitality Management, LLC dba LongHorn SteakHouse and David Williams have a “duty to avoid unnecessary costs of serving the summons” by acknowledging and waiving service of process pursuant to O.C.G.A. § 9-11-4(d). Plaintiff is affording RARE Hospitality Management, LLC dba LongHorn SteakHouse and David Williams an opportunity to comply with this duty. See: Notice of Lawsuit, filed contemporaneously hereto. However, if RARE Hospitality Management, LLC dba LongHorn SteakHouse and David Williams are non-compliant with the aforementioned duty, Plaintiff has a duty to serve them within five (5) days of the person making such service receiving a copy of the Complaint and Summons. See: O.C.G.A. § 9-11-4(c). As such, the Plaintiff wishes to be prepared, and moves to appoint Plaintiff’s process server to be ready to effectuate any service that may become necessary in this case.

3.

Raymond Cross meets the qualifications of being a process server in the State of Georgia. Exh. A.

4.

Plaintiff prays that this Honorable Court execute the included proposed order.

Executed today, February 3, 2023.

DOZIER LAW FIRM, LLC



David Thomas Dorer
Georgia Bar No.: 934408
Attorney for Billy Hill

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STATE COURT OF
DEKALB COUNTY, GA.
2/4/2023 12:59 PM
E-FILED
BY: Monica Gay

**EXHIBIT
A**

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AFFIDAVIT OF RAYMOND CROSS

COMES NOW, Raymond Cross, appearing remotely, and after being duly
sworn via electronic means, attests, under oath, that the following is true and
correct to the best of my knowledge:

1.

My name is Raymond Cross, I have reached the age of legal majority, am of
sound mind, have not taken any mind-altering substances which would impair my

testimony or would interfere with my full and complete understanding of the oath I have sworn to when providing this affidavit of my testimony.

2.

I am a citizen of the United States, and I am unrelated, by blood or marriage, to the parties to this action.

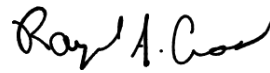
3.

I am a licensed investigator in good standing with the State of Georgia.

4.

I have been a court appointed process server in numerous Georgia counties including Bibb, Houston, Jones, Peach, Crawford and the Ocmulgee Judicial Circuit. I am a permanently appointed process server in Bibb Superior Court.

Executed today, February 3, 2023.



Raymond Cross

Remotely sworn to and subscribed
before me today, February 3, 2023

/s/ Mariah Cohen

Notary Public

My Commission Expires: 8/1/2023

